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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

THE CENTER FOR INVESTIGATIVE
 REPORTING and SHOSHANA WALTER

Plaintiffs,

v.

U.S. DEPARTMENT OF LABOR

Defendant.

Case No. 3:19-CV-07417-LB

**JOINT STIPULATION TO DISMISS
 WITH PREJUDICE;
~~PROPOSED~~ ORDER**

Subject to this Court's approval, the parties to this action through their undersigned counsel

JT. STIPULATION TO DISMISS WITH PREJUDICE; [PROPOSED] ORDER
 Case No. 3:19-CV-07417-LB

1 stipulate and request to dismiss this action. The basis for this request is set forth below:

2 WHEREAS, Plaintiffs brought this action under the Freedom of Information Act (“FOIA”), 5
3 U.S.C. § 552 seeking records from Defendant, the Wage and Hour Division (“WHD”) of the
4 Department of Labor involving Synanon from 1960 through 1989.

5 WHEREAS, on September 10, 2019, Defendant notified Plaintiffs that its June 24, 2019
6 “Glomar” response to the request was improper and that the request was being remanded to WHD for
7 further evaluation.

8 WHEREAS, on January 6, 2020, Defendant provided a supplemental response to the request
9 stating that, after searching for responsive information, Defendant did not find any responsive case files.
10 The supplemental response also described Defendant’s search efforts.

11 WHEREAS, after the above information has been provided to Plaintiffs, the case may be
12 dismissed.

13 THEREFORE, the parties, by and through their counsels of records, hereby stipulate, pursuant to
14 Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, to the dismissal, with prejudice, of any and
15 all claims against Defendant in the above-captioned matter, with each party to bear their own attorneys’
16 fees and costs incurred in this action.

17 IT IS SO STIPULATED.

18 DAVID L. ANDERSON
19 United States Attorney

20 Dated: January 8, 2020

By: /s/ Emmet P. Ong
EMMET P. ONG
Assistant United States Attorney

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22
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24 Dated: January 8, 2020

By: /s/ D. Victoria Baranetsky
D. VICTORIA BARANETSKY
The Center for Investigative Reporting
Attorney for Plaintiffs

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27 **In compliance with Civil Local Rule 5-1(i), the filer of this document attests that all signatories listed
have concurred in the filing of this document.*

28 JT. STIPULATION TO DISMISS WITH PREJUDICE; [PROPOSED] ORDER
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~~PROPOSED~~ ORDER

IT IS SO ORDERED THAT THE STIPULATION IS APPROVED:

Having read and considered the foregoing stipulation, the Court hereby orders the dismissal, with prejudice, of any and all of Plaintiffs' claims against Defendant Department of Labor. Each party will bear their own attorneys' fees and costs incurred in this action.

IT IS SO ORDERED.

DATED: January 8, 2020



LAUREL BEELER
United States Magistrate Judge